

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division
In Admiralty**

In the Matter of COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING as Owner and Operator of M/T Mackenzie Rose, (IMO No. 8968765) her cargo, engines, boilers, tackle, equipment, apparel, and appurtenances, etc., *in rem*, petitioning for Exoneration from or Limitation of Liability in allision with Norfolk and Portsmouth Belt Line Railroad Company Main Line Railroad Bridge occurring June 15, 2024 in and about the Elizabeth River, Virginia.

Civil Action No: 2:24-cv-00490

JOINT MOTION TO AMEND SCHEDULING ORDER

Petitioner Coeymans Marine Towing, LLC dba Carver Marine Towing (“Petitioner” or “Carver”), and Claimants Norfolk and Portsmouth Belt Line Railroad Company (“Belt Line”) and Evanston Insurance Company (“Evanston”), jointly request to amend deadlines in the Court’s Rule 16(b) Scheduling Order. No change to the trial date is requested or sought. In support thereof, the parties state as follows:

1. Carver requested to take the deposition of Claimant’s valuation expert, John Poulson, to be completed before any rebuttal expert disclosure by Carver’s valuation expert, Jason Meyerrose, which is currently due on August 22, 2025 in accordance with the scheduling order.
2. Because Mr. Poulson’s deposition cannot be taken until August 27, 2025, the parties have agreed the deadline for any rebuttal report by Mr. Meyerrose shall be September 3, 2025.
3. Except for the foregoing, no other changes to the scheduling orders (Docs. 32, 56, and 66) are requested.

WHEREFORE, the parties, Petitioner Coeymans Marine Towing, LLC d/b/a Carver Marine Towing and Claimants Norfolk and Portsmouth Belt Line Railroad Company and Evanston Insurance Company, by counsel, respectfully request that the Court modify the scheduling order in accordance with the proposed Order submitted herewith.

Dated: August 19, 2025

NORFOLK AND PORTSMOUTH BELT
LINE RAILROAD COMPANY

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CERTIFICATE OF SERVICE

I certify that on this 19th day of August 2025 a true and correct copy of the foregoing was served upon the following via the CM/ECF electronic filing system or as noted:

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